

Lewis, Judith

From: Michael Gelinne <michael.gelinne@bayer.com>
Sent: Monday, August 24, 2015 11:17 AM
To: FOIA HQ
Subject: FOIA Request for Registered Establishment Information

August 25, 2015

US Environmental Protection Agency
HQ FOIA Operations Staff (2822T)
Ariel Rios Building
1200 Pennsylvania Ave., N.W.
Washington, D.C. 20460

Subject: FOIA Request for Registered Establishment Information

Dear FOIA Staff,

Bayer CropScience (Bayer) would like to request information related to pesticide producing and device producing facilities registered with the US Environmental Protection Agency (EPA). Bayer intends to use this information for compliance purposes (i.e. to verify registration status of tolling establishments contracted by Bayer). This will ensure Bayer complies with all provisions of FIFRA but will also aid in avoiding delays when sourcing of new products is needed.

Bayer is requesting the full data set allowed for distribution for production year 2014. Please provide all records up and through 2014 as an immediate action. Please refer to FOIA request EPA-HQ-2015-000274 for further information on Bayer's FOIA request for 2013 information and the final EPA output granted to Bayer.

The download should include, but not be limited to the following data elements which have been previously released to Bayer:

Pesticide Report

- ☐ Product Number
- ☐ Establishment Number
- ☐ Establishment Name
- ☐ Establishment Address (City, State, Postal Code)
- ☐ Product Name
- ☐ Product Market
- ☐ Product Type
- ☐ Product Use

Pesticide Production and Distribution Report

- ☐ Production Report Summary
- ☐ Establishment Number
- ☐ Company Name
- ☐ Mailing Address (including City, State, and Postal Code)
- ☐ DUNS Number
- ☐ Site Address (City, State/Provide, Country, Postal Code)
- ☐ EPA Region Number

Company Index Report

- ☐ EPA Establishment Number
- ☐ Establishment Name

- ☐ Establishment Site and Mailing Address
- ☐ Date Created
- ☐ Date Updated
- ☐ Establishment Phone Number
- ☐ Company Number
- ☐ DUNS Number
- ☐ Company Name
- ☐ Company Site and Mailing Address
- ☐ Date Created
- ☐ Date Updated
- ☐ Company Phone Number

Data for these printouts should include all EPA Establishment numbers foreign and domestic, active and inactive. Bayer anticipates these fields should correspond to EPA's Pesticide Production report form (3540-16) and fields that have been established for the electronic reporting of annual production data on CDX. Additionally, Bayer expects that information submitted to the agency for the registration of the facility using EPA's 3540-8 form will also be included in these reports for each company, and for each facility registered by that company.

Bayer does not feel that information requested is protected under FIFRA Section 10 (Confidential Business Information), as we are not requesting actual production information only information which has been released to Bayer in the past.

Bayer requests that the information be provided in electronic format, in a spreadsheet (EXCEL) application. Bayer is willing to incur up to \$500.00 in administrative fees to process this request. Should this fall out of line with the projected workload, please contact Bayer at any time to discuss.

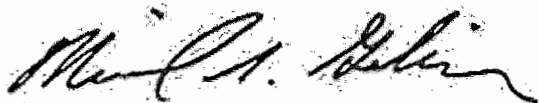
Information requested may be sent to the attention of:

Michael S. Gelinne
Bayer CropScience
2 T.W. Alexander Dr.
Research Triangle Park, NC 27709
Michael.gelinne@bayer.com

919-549-2879

Bayer CropScience appreciates the Agency's help in this regard and should you have further questions please contact Michael Gelinne at (919)-549-2879, Michael.gelinne@bayer.com

Yours truly,



Michael S. Gelinne
Regulatory Documentation Manager

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